

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

V.

JOHN M. FIFE, CHICAGO VENTURE
PARTNERS, L.P., ILIAD RESEARCH AND
TRADING, L.P., ST. GEORGE
INVESTMENTS LLC, TONAQUINT, INC.,
AND TYPENEX CO-INVESTMENT, LLC,

Defendants.

Civil Action No. 1:20-cv-05227

Honorable Nancy L. Maldonado
Honorable Heather K. McShain

JOINT STATUS REPORT

Pursuant to the Court’s November 22, 2023 Order (“Order”) (*see* Dkt No.147), Plaintiff United States Securities and Exchange Commission (“SEC”) and Defendants John M. Fife (“Fife”), Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants,” and, together with the SEC, “the Parties”), respectfully submit this Joint Status Report. The Parties state as follows:

A. Status of Outstanding Fact Discovery

On December 11, 2023, the SEC served its Second Set of Requests to Admit and Third Set of Document Requests on Defendants. On December 19, 2023, the SEC took a deposition in Chicago of one of Defendants' employees. The SEC has scheduled a deposition for early January in Nashville, Tennessee, of a third-party individual whom the SEC believes was involved in certain of Defendants' convertible debt transactions. The SEC has scheduled depositions for late

January in Chicago of Fife and one of Defendants' employees. Defendants intend to serve certain additional written discovery requests on the SEC this week.

The current fact discovery cutoff date is January 15, 2023. Prior to that date, the Parties intend to file a motion to extend the fact discovery cutoff to accommodate certain of the depositions referenced above and to accommodate written discovery and the resolution of pending disputes (*see* Dkt Nos. 117-128, 140, 143-145) over certain written discovery requests that the Parties previously served.

B. Statement Regarding Settlement Discussions

There have been no recent discussions of a settlement. The Parties do not request a settlement conference at this time.

C. Other Matters

There are no other matters that the Parties wish to bring to the Court's attention at this time.

DATED: December 21, 2023

/s/ Eric M. Phillips

Eric M. Phillips
Christopher H White
Regina LaMonica
U.S. Securities and Exchange Commission
175 West Jackson Boulevard, Suite 1450
Chicago, IL 60604
Telephone: (312) 353-7390
Email: phillipse@sec.gov

Counsel for Plaintiff

/s/ Helgi C. Walker

Helgi C. Walker*
Brian A. Richman*
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Ave. NW
Washington, DC 20036
Telephone: (202) 955-8500
Email: hwalker@gibsondunn.com

Barry Goldsmith*
M. Jonathan Seibald*
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-2440
Email: bgoldsmith@gibsondunn.com

Michael J. Diver
Elliott M. Bacon
KATTEN MUCHIN ROSENMAN LLP
525 West Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Email: Michael.diver@kattenlaw.com

Counsel for Defendants

** Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December, 2023, I electronically filed a copy of the foregoing Joint Status Report through the Court's CM/ECF System, which will send notifications of the filing to all counsel of record.

/s/ Eric M. Phillips